UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
VS)	CR. NO. 17 – 0011 - JJM
JASON D. BOUDREAU)	

AFFIDAVIT OF SANDRA CLARK IN SUPPORT OF MOTION TO SUPPRESS (DOC. 68)

- I, Sandra Clark, swear to the truth of the following:
- 1. I, Sandra Clark, am employed as a legal assistant at the Office of the Federal Defender for the District of Rhode Island.
- 2. I prepared this affidavit with the assistance of Assistant Federal Defender Olin Thompson. This affidavit does not contain every piece of information I know regarding these events, but only those facts he felt were relevant for the Motion to Suppress the search of Mr. Boudreau's Huawei cell phone and accompanying microSD card.
- 3. As part of my duties I have worked with Attorney Thompson representing Jason Boudreau.
- 4. As relates to the Boudreau case, my duties have included responding to letters from Mr. Boudreau seeking copies of filings in civil case *Boudreau v. Lussier, et al*, 13-cv-388 WES-LDA (hereinafter "Civil Case").
- 5. When we received these letters Attorney Thompson would ask me to print out the requested documents and exhibits and send them to Mr. Boudreau at the Wyatt Detention Center.
- 6. I did send Mr. Boudreau the documents and exhibits he requested, although on certain documents or exhibits were unavailable because they were marked "restricted access." In addition, at least one of the requested exhibits was an audio file not available for download.

- 7. On today's date, February 28, 2017, Attorney Thompson asked me to review the Boudreau file for letters from Mr. Boudreau requesting documents related to the Civil Case.
- 8. In total I located 12 separate letters from Mr. Boudreau to Attorney Thompson requesting various documents, exhibits, and filings from the Civil Case via PACER.
- 9. In total these letters requested copies of over 100 separate filings, along with over 100 separate exhibits attached to those filings.
- 10. Specifically for the time period from January 1, 2016 through March 15, 2016, Mr. Boudreau sent six separate letters requesting 36 separate documents, along with their attached exhibits.

Sandra Clark

I swear the above affidavit was drafted with Ms. Clark, reviewed by her, and signed by her, before me, on February 28, 2018

/s/ Olin Thompson, #5684

Olin Thompson